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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicant:

Dennis L. Matthies

Serial No.: 09/904,269

Filed: July 12, 2001

For: Assembling Display Modules

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Art Unit: 2875

Examiner: Dalei Dong

Atty Docket: ITL.0571US
P11416

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Sir:

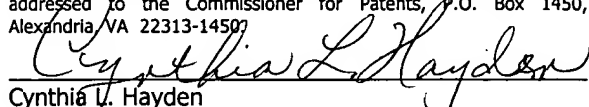
This reply brief responds to the new points raised by the Examiner under the heading
Response to Arguments.

Initially, the Examiner asserts that it would be obvious to flatten the sheets. See
Examiner's Answer at pages 5-6. Of course, this simply begs the obviousness question and fails
to make out a *prima facie* rejection. There is no obviousness per se and the Examiner's
argument that something would be obvious without citing to something in the prior art is plainly
insufficient.

The Examiner also argues at the top of page 6 of the Examiner's Answer that it is
inherent property "that the sheet must be flattened or held in a flat configuration before being

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Cynthia L. Hayden

manufactured or before its being placed in the vacuum chuck.” This is plainly incorrect. As pointed out by the Applicant, commonly, sheets were and are processed unflattened. It results in lots of problems. There is no reason that sheets must be held in a flat configuration. Unless something is done, the sheets will not be held in a flattened configuration. Therefore, there is no inherency here.


The Examiner continues to assert that once placed in a vacuum chuck, the sheet must be flattened. But this simply is not so. If the sheet is sufficiently stiff, it will not be flattened by a vacuum which is not sufficiently strong to flatten the sheet.

The Examiner also suggests that elements that are not in the claim are argued. However, claim 1 calls for temporarily flattening the sheet, processing said sheet, and securing said sheet to a second sheet while continuing to hold said sheet in a flattened configuration. Thus, the claim clearly and explicitly calls for adding a component to the flattened sheet. The Examiner’s arguments to the contrary are incorrect.

Since the rejection is totally baseless, it should be reversed.

Respectfully submitted,

Date: March 19, 2004



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